

From: [PETERSON Jenn L](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#)
Cc: [Joe Goulet/R10/USEPA/US@EPA](#)
Subject: Sturgeon FSP Comments
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Here are some brief comments on the sturgeon FSP:

Page 2, Section 2.0, Sampling Approach: One of the data needs that is listed in this section is to "characterization of white sturgeon body burdens in both quiescent and high-flow areas". Given the little information on habitat use by sturgeon, I don't think we can attribute the fish body burden with areas where they are caught. We may be able to catch them in deep pools, but that does not mean that is where the primary exposure occurs.

Page 8, Section 3.1, Field Sampling: Maturity is estimated here by a logarithmic regression of average fork lengths of white sturgeon. However, it would be more conservative based on potential body burden to collect the fish based in the Oregon Dept. of Fish and Wildlife's estimate, which is 60 inches. The exact age and length of when maturity begins has a range associated with it. Therefore, it would be more relevant to at least capture the range of fish in the pre-breeder class of fish, and associated body burdens. We will be analyzing individual fish, so a range of sizes will not impact the samples (as would occur with composite sampling). It will likely be difficult to capture larger fish, and if we choose to limit the size class we may likely not meet the objectives of sampling 15 fish, or it may skew the sampling size range to the smaller size classes since these will be easier to collect. I would recommend keeping all fish in the range of 42 to 60 inches for analysis until 15 fish are collected, and to alter the collection plan if necessary to increase the chances of collecting the larger sturgeon (e.g. hook size and type, set line placement).

Page 12, Section 4.1, Analytical laboratory Sample Processing: We should be archiving extra homogenized sturgeon tissue in case there are problems or questions about the analysis and a re-analysis is needed.

I am assuming they are proposing to analyze PAHs and SVOCs using SIM analysis, as in the Round 1 data collection effort. However, there are problems with using this approach. I would recommend doing a full scan analysis first (instead of SIM) in order to find out what compounds may turn up during analysis, since we don't have a good targeted list. If this is not done, co-elutions may mask the presence of another analyte, or we will end up with impairment of instrument sensitivity and not achieving the target sensitivity. This could result in elevated detection limits that are not useful, similar to the Round 1 fish tissue data. Instead, full scan HVOC analysis should be done first (8270). After this analysis, SIM analysis should be run for those compounds that were non-detect only. This will minimize impaired sensitivity and the need to dilute extracts and will provide more information on the range of analytes present in fish tissue. (By the way I got this information from EPA, Region 10 - one of Gina's colleagues I believe, but I have misplaced his name. Dana Davoli was also on the call. He indicated this is the approach they are using on other Superfund sites).

Page 13, Section 4.2, Chemical Analysis: One of the data gaps we identified in our Dec. data gaps analysis was the lack of tissue data for PBDEs. We agreed to push for this analysis in new tissue collected from the site. Well, this is the first tissue collection since that evaluation, and we could choose to add PBDEs to the analyte list.